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US EPA RECORDS CENTER REGION 5



501096



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**LAPEER METAL PRODUCTS
(FORMERLY THE UNION CAMP CORPORATION)
LAPEER, MICHIGAN
MID 050 615 921**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	MID 050 615 921
Date Prepared	:	December 8, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087MI4Z
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**ENFORCEMENT
CONFIDENTIAL**

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) at the Lapeer Metal Products (Lapeer Metals) facility in Lapeer Township, Lapeer County, Michigan. No areas of concern (AOC) were identified during the PA/VSI. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Lapeer Metals facility is currently used to assemble various metal parts for the production of automobiles. Welding and assembly operations currently conducted at this facility began in January 1992. The only production-related waste currently generated at the facility is scrap metal. No hazardous wastes are generated at the facility. Lapeer Metals has operated the facility at its current location since January 1992. The facility occupies 9.2 acres in a residential, agricultural, and light industrial area and employs 80 people.

The facility was originally owned and operated by the Union Camp Corporation (Union Camp). Union Camp manufactured corrugated paperboard at the facility from May 1969 until September 1982. Union Camp sold the facility to the William Beaumont Hospital in September 1982. In May 1984, the facility was sold to Beaumont Shared Services. The William Beaumont Hospital and Beaumont Shared Services used the facility as a supply warehouse. In August 1991, Beaumont Shared Services sold the facility to Lapeer Metals.

No information is available regarding the wastes generated at the facility while it was owned by the William Beaumont Hospital or Beaumont Shared Services. While Union Camp owned and operated the facility, hazardous wastes were generated when flexographic ink was applied to corrugated paperboard. Waste flexographic ink containing chromium (D007) and lead (D008) was generated when corrugated paperboard boxes were labeled.

In February 1982, EPA approved closure of the Former Container Storage Area (SWMU 2). Closure of SWMU 2 was approved by EPA after 10 55-gallon drums of flexographic ink waste (D007 and D008) were removed from the facility and transported to Chem Met Services in Wyandotte, Michigan. All equipment contaminated with hazardous constituents was also removed from the facility, and the property was determined to be clear of hazardous wastes. Lapeer Metals currently uses SWMU 2 as a storage area for miscellaneous metal parts and for the storage

ES-1

Release
1/12/16
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of gases used to operate welding equipment. The facility is currently regulated as a closed storage facility.

The PA/VSI identified the following two SWMUs at the facility:

Solid Waste Management Units

1. Scrap Metal Dumpster
2. Former Container Storage Area

The potential for a release to ground water, surface water, on-site soils or air from this facility is low. This facility no longer generates or stores hazardous wastes and does not emit any apparent vapors. The only production-related waste currently generated at the facility is scrap metal. The scrap metal is stored in a Scrap Metal Dumpster (SWMU 1) and is transported off site weekly by the Victor Steel and Supply Company of Detroit, Michigan.

EPA approved RCRA closure of the Former Container Storage Area (SWMU 2) in February 1982. This unit was located indoors in a completely enclosed building. During the VSI, PRC observed no cracks in the concrete base of this unit.

Ground water is used as a private water supply in the vicinity of the Lapeer Metals facility. However, most wells in Lapeer County are deep bedrock aquifer wells that obtain ground water from a sandstone aquifer. The regional sandstone bedrock is overlain by clay layers that most likely would prevent hazardous constituents from migrating to the sandstone aquifer. The nearest drinking water wells are on the property of a private residence, approximately 500 feet northeast of the Lapeer Metals facility, and at the Detroit Edison facility, approximately 500 feet south of the Lapeer Metals facility. The Detroit Edison well, and most likely the private residence well, are deep aquifer wells that obtain ground water from at least 50 feet below the bedrock surface.

PRC recommends that no further action be taken for the facility at this time.

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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE MI 02 SITE NUMBER
MD-060 615 921

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Lapeer Metal Products (formerly the Union Camp Corporation)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 1070 Clark Road				
03 CITY Lapeer Township	04 STATE MI	05 ZIP CODE 48448	06 COUNTY Lapeer	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 43° 02' 10" N		LONGITUDE 83° 18' 30" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Take State Route 21 west to Clark Road; take Clark Road south about one mile to facility.					

III. RESPONSIBLE PARTIES

01 OWNER (If known) Lapeer Metal Products	02 STREET (Business, mailing, residential) 1070 Clark Road				
03 CITY Lapeer Township	04 STATE MI	05 ZIP CODE 48448	06 TELEPHONE NUMBER (313) 884-8588		
07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)				
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		
13 TYPE OF OWNERSHIP (Check one) <input type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 08/15/80 MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY (Check all that apply) <input type="checkbox"/> YES DATE 08/30/92 <input type="checkbox"/> NO <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)		03 YEARS OF OPERATION 1989 Present <input type="checkbox"/> UNKNOWN BEGINNING YEAR ENDING YEAR	
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED From May 1989 to September 1992, the facility was a corrugated paperboard manufacturing facility. Waste flexographic ink containing chromium (D007) and lead (D008) was generated at the facility when corrugated paperboard boxes were labeled. The ink was stored in an indoor container storage area. EPA approved RCRA closure of the container storage area in February 1992. The facility is now owned by Lapeer Metal Products and is operated as a metal welding and assembly facility. Hazardous wastes are no longer managed at the facility.			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION None			

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Margaret B. Flaherty	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (312) 856-8700	08 DATE 08/30/92 MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**Lapeer Metal Products
(formerly the Union Camp Corporation)
Lapeer, Michigan
MID 050 615 921**

Date: June 30, 1992

Primary Facility Representative: Charles Knockeart, Plant Manager
Representative Telephone No.: (313) 664-8588
Additional Facility Representatives: Peter Martz, Vice President

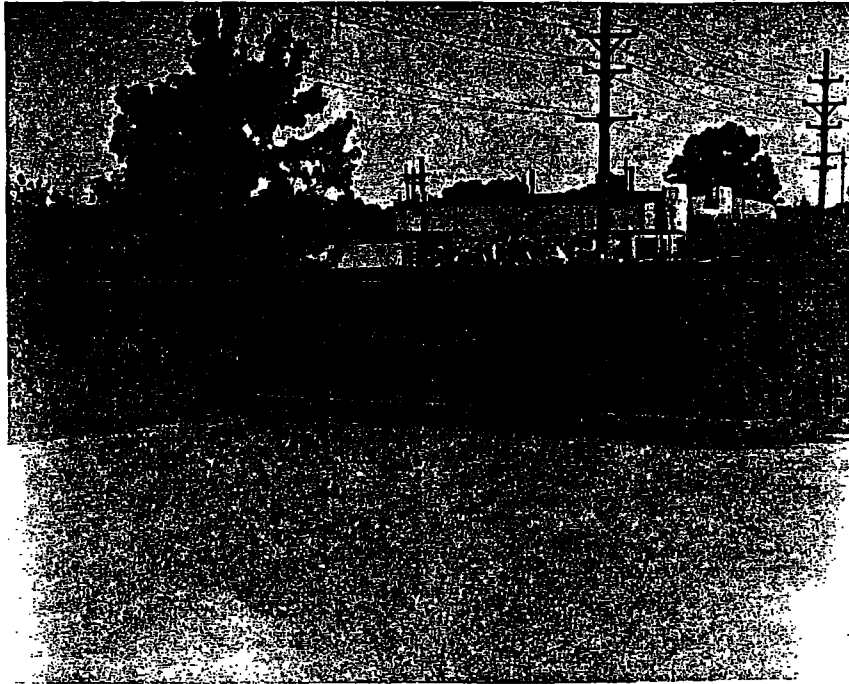
Inspection Team: Margaret Flaherty, PRC Environmental Management, Inc.
(PRC)
Terrence Quirk, PRC

Photographer: Terrence Quirk

Weather Conditions: Sunny, about 78°F

Summary of Activities: The visual site inspection (VSI) began at 10:05 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. The inspection team was given a tour of the facility, including the Scrap Metal Dumpster (SWMU 1) and the Former Container Storage Area (SWMU 2).

The tour concluded at 10:35 a.m., after which the facility representatives discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI was completed and the inspection team left the facility at 11:35 a.m.



Photograph No. 1

Orientation: Northwest

Description: Scrap Metal Dumpster used to store up to 20 cubic yards of scrap metal generated by welding and assembly operations

Location: SWMU 1

Date: 06/30/92



Photograph No. 2

Orientation: Northwest

Description: Former Container Storage Area located along northern portion of facility building, now used to store miscellaneous metal parts and tanks of welding gases

Location: SWMU 2

Date: 06/30/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

TUESDAY, JUNE 30, 1992⁽¹⁾
SUNNY, $\approx 78^{\circ}\text{F}$

1005 ARRIVE AT THE LAPEZ
METALS FAMILY. PETER MARTZ
AND CHARLES KNOCKEART
TOOK US OVER TO THE ASSEMBLY
PLANT FOR A TOUR. THE PLANT
IS STRICTLY FOR ASSEMBLING THE
METAL. STAMPING OPERATIONS ARE
CONDUCTED NEXT ^{DOOR P.B. 11000} ~~ADJACENT~~ THE METAL
PARTS ARE ASSEMBLED FOR FORD,
GM, & CHRYSLER. TOOK US
INTO THE PLANT.

PHOTO #1 - NORTHWEST, ORIG.

CONTAINER STORAGE AREA

- CURRENTLY USED FOR THE STORAGE OF
OF GASES FOR RUNNING THE WELDERS
i.e. OXYGEN, ARGON

PHOTO #2 EAST - STORAGE AREA 991,

P. Flaherty
04/30/92 12

(2)

09/22/92
P. J. OUTDOOR AREA NOT USED FOR WASTE STORAGE
~~OUTDOOR~~ (FORMER) - BLACK TOP, LOOKING EAST

PHOTO #3 DUMPSTER CONTAINING
SCRAP METAL, SCRAP METAL
IS TAKEN FOR RECYCLING APPROX.
ONCE A WEEK BY VICTOR

1035

TOTAL SQ. FT. IS 53,000 SQ. FT.,
~ 900 SQ. FT. OFFICE
9.2 ACRES,

OWNERS: SHARED SERVICES OF
BEAUMONT HOSPITAL

PHOTO #4 NORTHEAST
- DUMPSTER, CARDBOARD, WOOD,
GEM WASTE

PHOTO #5 - SAME AS ABOVE
WASTE OIL - MANAGED AT STAMPING
OPERATIONS BLDG. IN 2ND FLOOR.
P. J. Flaherty 10/20/92

(3)

TAKEN OFF SITE BY CONTRACTOR

APPROX. 80 EMPLOYEES CURRENTLY
2 SHIFTS, 5 DAYS
SIT-DOWN DISCUSSION
SCRAP METAL PRICED AT \$84/TON,
~ 300-400 TON / MONTH

ALL UNDERGROUND PARTS

GRAND TRUCK RR - DETROIT - ENDS
OUT HERE

- ON CITY WELL WATER
- DETROIT EDISON HAS WST,
NEIGHBOR TO THE SOUTH.
- TESTING WAS DONE TO ACQUIRE
A CLEAN BILL OF HEALTH BEFORE
PURCHASING THE BLDG.

- BLDG PURCHASED IN APR. 1991,
P. J. Flaherty 04/30/92

(4)

OPERATIONS IN JANUARY 1992.
BERMONT HOSPITAL FULL OWN
5 ACRES NORTH - THEIR
SUBSIDIARY KNOWN AS "SHARED
SERVICES.

- SECURITY IS PROVIDED TO
THE BUILDING BY A 24-HOUR
SECURITY SYSTEM

- STATION OUT IN FRONT PUMPS
THEIR DISCHARGES INTO THE
CITY SEWER

- WATER "TIE IN" PLACED
IN BY UNION CAMP, TO
HAVE SPRINKLER SYSTEM PLACED
IN BUILDING.

- DETROIT EDISON TO SOUTH,

- "SILK-SCREEN" T-SHIRT PLACED
TO NORTH, AND LAFER
METAL PRODUCTS STRUCTURE BUILDING

P. Flaherty 06/30/92

(5)

WEST - INDUSTRIAL PARK,
EAST - FARM LAND, HIGH SCHOOL
TO NORTHEAST, FEW RESIDENCES,
\$8 MIL. / YEAR 260%

CAPACITY

P.F. 1960

- OTHER BOD. SINCE 1964

- NO DRUMMED WASTE ON
SITE

- SUMP USED BY UNION
CAMP, WAS REMOVED - TOOK
OUT PUMP AND NEARBY
INK TANK.

- ITEM MENTIONED IN SITE
ASSESSMENT REPORT, WE WILL
LOOK AT AND PHOTOGRAPH

WALTER MECHANICAL SERVICE
TAKE CARE OF BOILER, COME IN
MONTHLY ? SERVICE IT, OUT
OF FUNT

P. Flaherty 06/30/92

6

CAL GAS, OUT OF CAPAC,
MI, TAKES EMPTY GASOLINE
CONTAINER.

- NO AIR OR WATER
PERMITS

PHOTO *6 WET, BOILER

1120

PHOTO *7

1135

- FLOOR DRAWS GO OUT TO

PUMP STATION IN FRONT, AND
INTO CITY SANITARY SYSTEM.

"TIM" IS W/ CITY SEWAGE
DEPT.

PHOTO *8 Sump, PUMPED APPROX.
EVERY 2 MONTHS

TWO DITCHES ONE ON NORTH E

P. Flaherty 06/30/92

7

ONE ON SOUTH END OF PROPERTY,
DRAINAGE TOWARD THE STREET

FOR CONCLUDED, MR. KNOCKEART
MADE COPIES OF FACILITY MAPS FOR
US.

PRC OFF SITE.

Flaherty

LAPEER

METAL PRODUCTS COMPANY
A HISPANIC MINORITY COMPANY

Peter Martz
Vice-President

LAPEER

METAL PRODUCTS COMPANY
A HISPANIC MINORITY COMPANY

Charles Knockeart
Plant Manager

930 S. SAGINAW ST.
LAPEER, MI 48446-2699

LAPEER: (313) 664-8588
FAX: (313) 664-9810
FAX: (313) 664-9351

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Scrap Metal/NA	Welding and assembly operations	1
Waste flexographic ink/D007 and D008	Labelling of corrugated cardboard boxes	2

Note:

^a Not applicable (NA) designates nonhazardous waste.

storage of gases used to operate welding equipment. The facility no longer manages hazardous wastes.

No documentation of any inspections conducted by MDNR at the Lapeer Metals facility was found. MDNR does not have any file information regarding the Lapeer Metals facility (PRC, 1992a and 1992b). The facility has no air or National Pollutant Discharge Elimination System (NPDES) permits and no history of odor complaints from area residents. The Lapeer Metals facility discharges its wastewater to the Lapeer metropolitan sanitary sewer.

There are no underground storage tanks (UST) at the Lapeer Metals facility. Three USTs are located at the adjacent Detroit Edison property. These three tanks, containing gasoline, diesel oil, and waste oil, are located approximately 300 feet south of the Lapeer Metals property. A Phase II subsurface investigation conducted at the facility in October 1991 included the drilling of two boreholes on the Lapeer Metals property near the USTs, and the collection and analysis of soil samples. The soil sampling analytical results indicated that the materials stored in the USTs had not migrated to the Lapeer Metals property (Testing Engineers, 1991b).

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Lapeer County is continental. The area does not experience lake effect precipitation (Ruffner and Blair, 1977). The total annual precipitation for the county is 31 inches. The mean annual lake evaporation for the area is about 29 inches. The 1-year, 24-hour maximum rainfall is about 2.3 inches (DOC, 1963). The annual mean wind speed is 10.2 miles per hour from the south; but in winter wind speeds are higher, blowing primarily from the western quadrants (Ruffner and Blair, 1977). The average daily temperature is 48.5°F, the lowest average daily temperature is 16.1°F, and the highest average daily temperature is 83.1°F (DOC, 1968).

2.6.2 Flood Plain and Surface Water

The Lapeer Metals facility is not located in a flood plain or a flood-prone area (FEMA, 1992). The nearest surface water body, Hunters Creek, is located 0.5 mile north of the facility and is used for drainage only. The Flint River is located 0.75 mile northeast of the facility and is

used as a fishery. The nearest wetland is located along Hunters Creek, approximately 0.5 mile north of the facility.

Surface water drainage at the facility is directed into two drainage ditches located along the north and south portions of the Lapeer Metals facility. These drainage ditches drain east into a ditch that runs parallel with Clark Road and apparently drains north to Hunters Creek (USGS, 1980).

The Lapeer Metals facility and the majority of Lapeer Township residents receive their water supply from Lake Huron via the Detroit and Lapeer municipal water supply systems (Lapeer City Hall, 1992). However, ground water is also used as a private water supply in the vicinity of the Lapeer Metals facility. The nearest drinking water wells are on the property of a private residence, approximately 500 feet northeast of the Lapeer Metals facility, and at the Detroit Edison facility, approximately 500 feet south of the Lapeer Metals facility. The Detroit Edison well, and most likely the private residence well, are deep aquifer wells that obtain ground water from at least 50 feet below the bedrock surface. Most wells in Lapeer County are deep bedrock aquifer wells that obtain ground water from a sandstone aquifer (PRC, 1992d).

2.6.3 Geology and Soils

Regional glacial drift near the facility is to a depth of between 100 and 200 feet. The drift generally consists of interbedded aquifers, aquicludes, and clay aquitards. Regional bedrock consists of Marshall sandstone of the Mississippian Period. The sandstone is 330-feet thick in some areas (Western Michigan University, 1981).

Soil boring logs for soil samples collected during a Phase II subsurface investigation conducted at the Lapeer Metals facility describe the subsurface soils as clayey sands with traces of silt to a depth of approximately 20 feet (Testing Engineers, 1991b). A well log for a water well at the Detroit Edison facility describes the soil beneath the subsurface sands to be comprised of clay to a depth of 76 feet, underlain by sand and gravel to a depth of 101 feet, and clay to a depth of 200 feet. Sandstone is at a depth of 200 feet (PRC, 1992d).

2.6.4 Ground Water

The static ground-water level in the vicinity of the Lapeer Metals facility is at a depth of approximately 35 feet (PRC, 1992d). Surface water bodies in the vicinity of the Lapeer Metals facility drain to the north and east. A wetland located approximately 0.5 mile north of the

facility appears to be a ground-water discharge area, inferring that shallow ground water flows to the north and northeast (USGS, 1980).

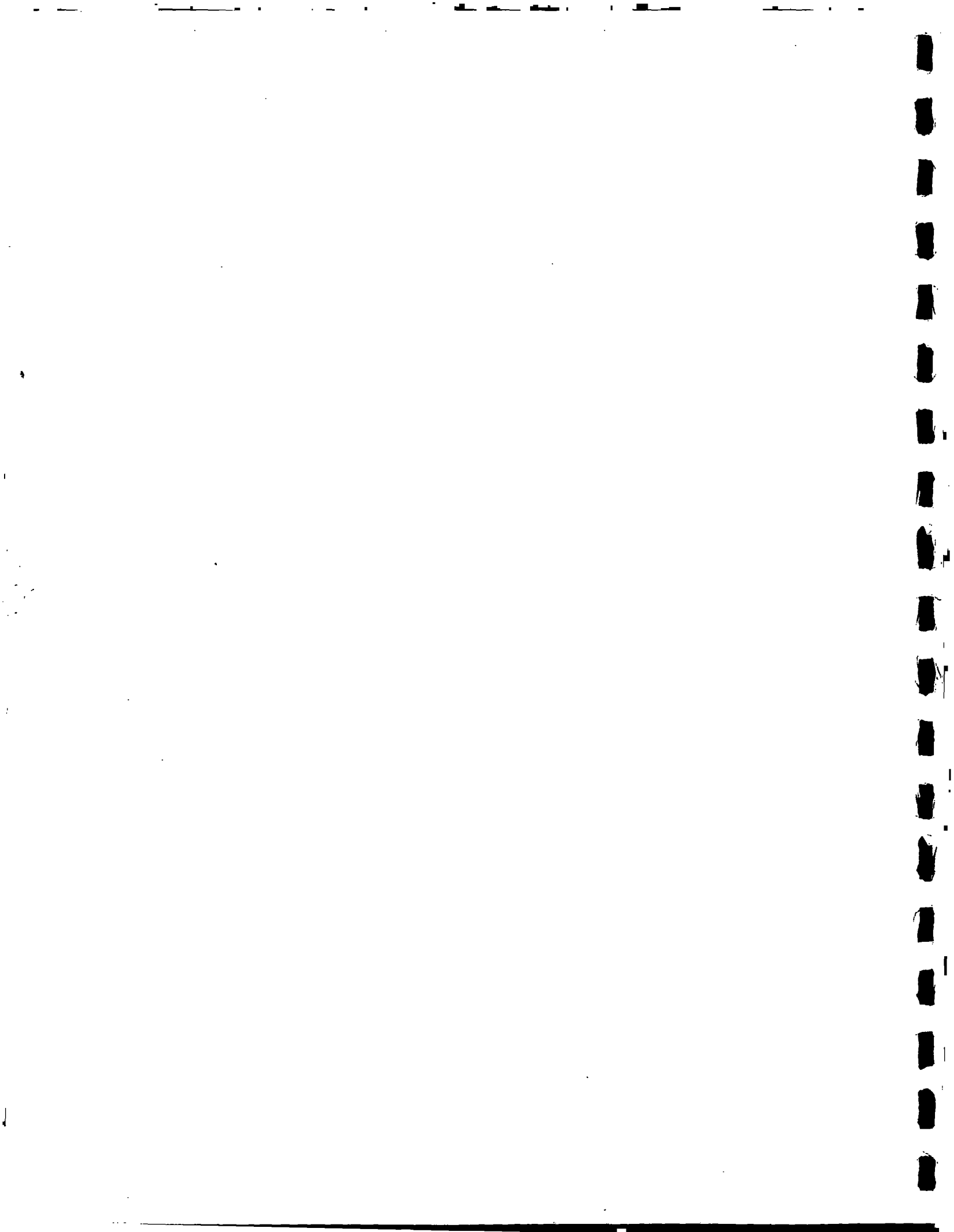
Ground water is used as a private water supply in the vicinity of the Lapeer Metals facility. Most wells in Lapeer County are deep bedrock aquifer wells that obtain ground water from below the bedrock surface. The well at the Detroit Edison facility is a deep aquifer well that obtains ground water from 100 feet below the bedrock surface. This well produces water at a rate of 200 gallons per minute (gpm) (PRC, 1992d).

2.7 RECEPTORS

The facility occupies 9.2 acres in a residential, agricultural, and light industrial area in Lapeer Township, Lapeer County, Michigan. Lapeer Township has a population of 4,519 (PRC, 1992e).

The facility is bordered on the north by a specialty print shop called Silver Screening Printing, and the Lapeer Metal Products stamping facility; on the northeast by a single-family residence and Lapeer East High School; on the west by New York Central Railroad tracks and an industrial park; on the south by Detroit Edison, and the Bradford Tool and Die Company; and on the east by Clark Road and farmland. Access to the facility building is limited by a 24-hour security system.

The nearest surface water body, Hunters Creek, is located 0.5 mile north of the facility and is used as a fishery and for recreational purposes. The Flint River is located 0.75 mile northeast of the facility and is used as a fishery (PRC, 1992f). The nearest wetland is located along Hunters Creek, approximately 0.5 mile north of the facility.



3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Scrap Metal Dumpster

Unit Description:

This outdoor steel unit is located on a concrete surface and has a capacity of approximately 20 cubic yards. Scrap metal generated during assembly operations is stored in this unit and transported weekly by the Victor Steel and Supply Company of Detroit, Michigan for recycling. The facility generates approximately 4,200 tons of scrap metal annually.

Date of Startup:

This unit began operation in January 1992.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages nonhazardous scrap metal generated by welding and assembly operations.

Release Controls:

This unit is constructed of steel and is located on a concrete surface.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, this unit contained approximately 20 cubic yards of scrap metal. This unit appeared to be in good condition, and PRC noted no evidence of release (see Photograph No. 1).

SWMU 2

Former Container Storage Area

Unit Description:

This indoor unit was located along the north end of the facility building. This unit consisted of a concrete area measuring approximately 125 feet by 50 feet. Drums of hazardous waste were

stored in this unit for more than 90 days. This unit is currently used for the storage of miscellaneous metal parts and for the storage of tanks of gases used to operate welding equipment.

Date of Startup:	This unit began operation in May 1969.
Date of Closure:	This unit has been inactive since it underwent RCRA closure in February 1982.
Wastes Managed:	This unit managed 55-gallon drums of waste flexographic ink (D007 and D008) generated at the facility by the Union Camp Corporation when corrugated paperboard boxes were labeled.
Release Controls:	This unit was located on a concrete floor in a completely enclosed building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, this unit contained tanks of welding gases and cardboard boxes filled with miscellaneous metal parts. PRC noted no cracks in the concrete base of this unit or any evidence of release (see Photograph No.2).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.